

DOCUMENT
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INDICTMENT

18 Cr.

18 CRIM 821

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(Firearms Trafficking)

1. From at least in or about July 2015 up to and including at least in or about August 2018, in the Southern District of New York and elsewhere, JUAN FRANCISCO REYES BONILLA, a/k/a "Clandestino", the defendant, not being a licensed importer, licensed manufacturer, and licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(a)(1)(A) and
2.)

COUNT TWO

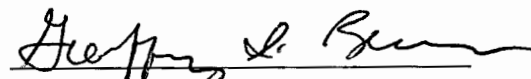
(Transporting Firearms in Interstate Commerce)

The Grand Jury further charges:

2. In or about the summer of 2015, in the Southern District of New York and elsewhere, JUAN FRANCISCO REYES BONILLA, a/k/a "Clandestino", the defendant, with the intent to commit therewith an offense punishable by imprisonment for a term exceeding one year, and with knowledge and reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year was to be committed therewith, shipped, transported, and received firearms in interstate and foreign commerce, to wit, REYES willfully caused six firearms to be shipped from North Carolina to Maryland, with the intent that these firearms would be used to engage in (a) the offense charged in Count One and (b) a conspiracy to participate in the affairs of an enterprise through a pattern of racketeering activity, in violation of Title 18, United States Code, Section 1962(d).

(Title 18, United States Code, Sections 924(b) and 2.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JUAN FRANCISCO REYES BONILLA, a/k/a
"Clandestino",

Defendant.

INFORMATION

18 Cr.

(18 U.S.C. §§ 922(a)(1), 924(b), and
2.)

GEOFFREY S. BERMAN
United States Attorney
